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December 19,2002

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Ms. Marlene Dortch Secretary Federal Communications Commission 445 Twelfth Street, S.W. 12" Street Loppy – TW – A325 Washington, D.C. 20554

DEC 2 0 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Petition for Rule Making

Smiley, Texas MB Docket No. 02-248 Motion for Leave to File Reply &

Reply to Opposition to Linda Crawford Response

Dear Ms. Dortch:

Enclosed is an original and four (4) copies each of my "Motion for Leave to File Reply" and "Reply to Opposition to Linda Crawford Response" for Smiley, Texas.

Respectfully submitted,

Linda Crawford

3'300 Maple Ave., #1320 Dallas, Texas 75219

Dallas, Texas 73215

(214) 587-0668

Tele

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Smiley MotionC

Before the Federal Communications Commission Washington, D.C. 20554

RECEIVED

DEC 2 0 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
Amendment of 73.202 (b)	}	MB Docket No. 02-248
Table of Allotments)	RM-10537
FM Broadcast Stations)	
(Smiley, Texas))	

To: John Karousos, Assistant Chief

Audio Division of the

Media Bureau

MOTION FOR LEAVE TO FILE REPLY

I, Linda Crawford, hereby request leave to file a Reply dated December 19, 2002 to the "Opposition to Linda Crawford Response" dated November 29,2002 filed by New Ulm Broadcasting Company. By my calculation, a reply to the opposition was due several days ago (December 11,2002). A last-minute delay occurred upon discovery of the need for preparation of the engineering Exhibit C attached to the reply, i.e., discovery that the "white area" certified in the engineering statements filed by New Ulm is a bogus claim and that New Ulm's Counterproposal will not result in service to either a "white area" or a "gray area." The public interest is served by Commission receipt and consideration of evidence of this critical error prior to arriving at its 307(b) determination in this matter.

The factual information provided in this "MOTION FOR LEAVE TO FILE REPLY" is correct and true to the best of my knowledge.

Respectfully submitted,

Linda Crawford

3500 Maple Avenue, #1320

Dallas, Texas 75219 (214) 587-0668

cc: Gene A. Bechtel, Law Office of Gene Bechtel, suite 600, 105017th Street, N.W., Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for the Petitioner. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as the Petitioner.

December 19,2002

CERTIFICATE OF SERVICE

I, Linda Crawford, hereby certify that on this 19th day of December, 2002, I caused copies of the foregoing "MOTIONFOR LEAVE TO FILE REPLY" to be placed in the U.S. Postal Service, first class postage prepaid, addressed to the following persons:

John Karousos, Assistant Chief Audio Division of the Media Bureau Federal Communications Commission Portals 11, Room 3-A266 445 12th Street SW Washington, D.C. 20554

R. Barthen Gorrnan Federal Communications Commission 445 12th Street, SW, Room 3-A224 Washington, D.C. 20554

Gene Bechtel, Esq. Law Offices of Gene Bechtel, P.C. 1050 17" Street, N.W., Suite 600 Washington, D.C. 20036-5517 (Counsel for Petitioner)

Robert J. Buenzle Law Offices of Robert J. Buenzle 11710 Plaza America Drive, Suite 2000 Reston, Virginia 20190 (Counsel for New Ulm Broadcasting Company)

Victoria Radio Works Ltd. Radio Station KVIC 8023 Vantage Dr., Suite 840 San Antonio, Texas 78230

Pacific Broadcasting of Missouri, LLC Radio Station KTKY 7755 Carondelet, Avenue Clayton, Missouri 63105

David P. Garland 1110 Hackney Street Houston, Texas 77023 Maurice Salsa 5616 Evergreen Valley Drive Kingwood, TX 77345

Bryan A. King BK Radio 1809 Lightsey Road Austin, Texas 78704

Matthew L. Liebowitz, Esq. Liebowitz & Associates, P.A. One SE Third Avenue, Suite 1450 Miami, Florida 33131 (Counsel for Next Media Licensing)

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Washington, D.C. 20005
(Counsel for LBR Enterprises, Inc.)

Linda Crawford